

### REMARKS

Favorable reconsideration of this application is respectfully requested.

Claims 65-91 are pending in this application. Claims 33-64 are canceled by the present response without prejudice and new claims 65-91 are presented by the present response. Claims 33-34, 41-42, 48-49, 55, and 60 were rejected under 35 U.S.C. § 102(e) as anticipated by U.S. patent application publication 2001/0014836 A1 to Tamaki et al. (herein "Tamaki"). Claims 35-40, 43-47, 50-54, 56-59, and 61-64 were rejected under 35 U.S.C. § 103(a) as unpatentable over Tamaki in view of U.S. patent 5,539,652 to Tegethoff.

Addressing the above-noted rejections, those rejections are traversed by the present response.

Each of the previously pending claims is canceled by the present response and new claims 65-91 are presented for examination. New claims 65-91 have been written to clarify claim features.

The claims now clarify an assembly information storage storing information about an assembly of plural parts, which as a non-limiting example discussed in the present specification may be a circuit board, and information of parts included in the assembly, including a name of the parts utilized in the assembly.

Further, a parts information storage stores parts information including functions of the parts. In the claimed invention, information about the names, etc. of parts constituting an assembly, such as an electronic board, is obtained on the basis of input information identifying the circuit board. Then, information about the functions, etc. of the parts forming the circuit board is obtained based on the information about the names, etc. of the parts.

Further, parts information obtained corresponding to information of parts on the circuit board can be replaced with information about other parts, for example having the same

functions. Thereby, replaced parts information can be generated and then stored. The features as discussed above are now clarified in the claims and are believed to clearly distinguish over the applied art. Further, such features as discussed above are believed to be fully supported by the original specification.

As shown for example in Figures 1 and 4 in the present specification, a Resource database DB1 can store assembly information of parts in an assembly and names of the parts. A parts information storage, such as Approved Parts DB in Figure 1, can store information including functions of parts corresponding to the parts information. Further, the resource parts list creating/editing unit 3 can retrieve parts information from the Resource DB1 and Approved Parts DB2 and can replace the parts information corresponding with the assembly information with other parts information, for example for other parts having the same function as parts in the retrieved assembly, and can store that replaced parts information in a memory.

The features as recited in the claims are believed to clearly distinguish over the applied art.

Tamaki is directed to a production system that can access a parts list storage section 2 for storing parts list information and a parts stock storage section 4 for indicating a stock of parts. Tamaki goes on to note the use of a data storage unit 10, a superfluous parts adjusting unit 112, and a deficient parts adjusting unit 111. However, such teachings in Tamaki merely disclose an operation that can ensure that desired parts are in stock.

Tamaki is not at all directed to a system for creating and/or editing structured parts list information. Instead Tamaki is directed to a manufacturing system that can ensure that a list of required parts is adequately stocked, and determine whether any parts are deficient or superfluous. Such a structure in Tamaki differs from the claims as currently written.

Tamaki discloses a parts list storage section 2, but Tamaki does not disclose or suggest that that element 2 stores information of different assemblies including parts, and information of a name of the parts, rather than just individual parts.

Tamaki also discloses a parts-in stock storage section 4 that is merely a listing of parts in storage and has no relation to the claim features.

Tamaki also clearly fails to teach or suggest the “parts information retrieving device” or “assembly information update device” recited in the claims.

According to the claimed features, different parts information is retrieved. The first piece of information that is retrieved is assembly information. As a non-limiting example provided for example in the present specification, an assembly information storage can store information directed to previously designed electronic circuit boards and known electronic circuit boards.<sup>1</sup> The second piece of information retrieved is parts attribute information. For example such information can include information of parts such as a parts identification, function, name and manufacture, shape, prospect, price, and/or approval data, and as now recited in the claims includes *function* information of other components, which for example may be comparable with one presently retrieved.<sup>2</sup> Based on those two pieces of information replaced parts information is generated. Such features are clearly not met by Tamaki.

As noted above, in the claimed features an assembly information storage stores information directed to *assembly information including a name of parts utilized in the assembly*. As an example noted above information directed to previously designed electronic circuit boards and known electronic circuit boards can be stored. The information of those circuit boards include names of the parts therein. Then, in the claimed invention parts information corresponding to the parts *of the assembly* is output. As noted above the

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<sup>1</sup> See for example the present specification at page 11, line 25 to page 12, line 6.

<sup>2</sup> See for example the present specification at page 13, lines 1-11.

assembly information can store information of an assembly such as an electronic circuit board; thus, in the claimed invention parts information for the parts that form that electronic circuit board component are then output, by the claimed “parts information storage”. Tamaki does not disclose any similar feature.

In Tamaki the parts list storage section 2 is merely a parts list storage section and does not store information of *assembly information including a name of parts utilized in the assembly*. Further, the parts stock storage section 4 in Tamaki merely indicates a stock of parts. In Tamaki if a part is not stocked, no information of that part would appear to be provided. Thus, Tamaki clearly does not output *parts attribute information including functions of parts corresponding to said parts information*, as also required in the claims.

Moreover, even if such elements in Tamaki correspond to the claimed features, which applicants dispute, Tamaki does not disclose or suggest creating replaced parts information based on information in the parts list storage section 2 and information the parts stock storage section 4.

Moreover, applicants respectfully submit Tamaki fails to teach or suggest the “parts information retrieving device” and “assembly information update device”, as recited in independent claim 65, and as similarly required in other claims.

As noted above, in the claims replaced parts information is stored in a memory. Tamaki also does not teach that feature.

In such ways, the claims as currently written clearly distinguish over Tamaki.

Further, with respect to the further rejection based on Tamaki in view of Tegethoffs, that rejection is traversed by the present response.

Tegethoffs is directed to a method for manufacturing test simulation in electronic circuit design and relates to a tradeoff between productivity and design property.

The device disclosed by Tegethoff has no relation whatsoever to the device of Tamaki. Tamaki as noted above is directed to a system to ensure that parts are adequately stocked. Tegethoff is not directed to any type of such system and thus has no relevance whatsoever to the teachings in Tamaki.

The motivation set forth in the Office Action to combine the teachings in Tegethoff relative to those of Tamaki is also improper. More specifically, the Office Action states the teachings of prediction concerning operation, simulation, etc. in Tegethoff could be applied to the teachings in Tamaki “because early prediction of manufacturing behavior drives design changes which optimize the product’s manufacturability and testability, thus improving product quality and reducing cost and utilizing a parts list would help facilitate this prediction. See column 6 of Tegethoff”.<sup>3</sup>

The above-noted basis for the outstanding rejection is believed to be clearly improper as Tamaki is not directed to a device that would have any benefit from “driving design changes”. Tamaki is clearly directed to a device utilized well *after any* type of design is implemented as Tamaki is directed to a device to ensure that parts are adequately stocked; which clearly takes place well *after any* design is implemented. The test simulation in electronic circuit design in Tegethoff has no relevance whatsoever to such a system as in Tamaki. Further, what the basis for the outstanding rejection has not even considered or addressed is why the noted teachings in Tegethoff would be relative to Tamaki as Tamaki is not directed to any “prediction concerning operation, simulation, etc.”.

In the Advisory Action of June 13, 2006, comments as to why the rejections are being maintained are set forth. However, in view of the presently written claim language the claims are believed to clearly distinguish over Tamaki.

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<sup>3</sup> Office Action of February 17, 2006, top of page 6.

Further, the comments presented as to why the teachings of Tamaki and Tegethoff would be combined are believed to be clearly improper. Tegethoff is directed to test simulation and electronic circuit design. The statement in the Advisory Action that such teachings are relevant in a system of Tamaki's structured parts list "because early prediction of manufacturing behavior drives design changes which optimize the product's manufacturability and testability, thus improving product quality and reducing cost and utilizing a parts list would help facilitate this prediction" not at all understood. In the basis for the rejection the teachings of Tegethoff are being combined to the teachings of Tamaki, and in such circumstances one must evaluate why one of ordinary skill in the art would modify the teachings of Tamaki to incorporate the system of Tegethoff. Clearly a system of Tegethoff which simulates electronic circuit design is irrelevant to a system of Tamaki that is directed to a system to insure that parts are adequately stocked. In such a system one of ordinary skill in the art would find test simulation for electronic circuit design to be completely irrelevant.

In such ways, applicants respectfully submit the further combination of teachings of Tamaki in view of Tegethoff is traversed by the present response.

In view of the foregoing comments applicants respectfully submit the claims as currently written clearly distinguish over the applied art.

As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance, and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

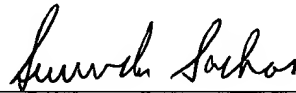
OBLON, SPIVAK, McCLELLAND,  
MAIER & NEUSTADT, P.C.

Customer Number  
**22850**

Tel: (703) 413-3000  
Fax: (703) 413 -2220  
(OSMMN 06/04)

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Gregory J. Maier  
Attorney of Record  
Registration No. 25,599

Surinder Sachar  
Registration No. 34,423